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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SEEVER MUSTAFA SULAIMAN, Plaintiff, v. MICHAEL CHERTOFF, Secretary of the United States Department of Homeland Security; EMILIO T. GONZALEZ, Director of the United States Citizenship and Immigration Services; GERALD HEINAUER, Director, Nebraska Service Center; PAUL M. PIERRE, District Director, San Diego District; MICHAEL MUKASEY, Attorney General; and ROBERT S. MUELLER III, Director of the Federal Bureau of Investigation, Defendants.	Case No. 07cv2293 BEN (CAB) JOINT MOTION TO EXTEND TIME FOR FILING OF RESPONSIVE PLEADING [Fed.R.Civ.P. 6(b)(1)]

COME NOW THE PARTIES, Plaintiff Seever Mustafa Sulaiman, by and through counsel, Robert G. Nadalin, and Defendants Michael Chertoff, et al., by and through their counsel, Karen P. Hewitt, United States Attorney, and Caroline J. Clark, Assistant United States Attorney, and hereby jointly move the Court to extend the time for filing of Defendants' responsive pleading. The parties are working toward an extrajudicial resolution of Plaintiff's complaint, and the parties have agreed that additional time is required before Defendants' filing of any responsive pleading in order to pursue resolution of Plaintiff's claims without the intervention of the Court. In order to address Plaintiff's claims and without waiving Defendants' rights to defend the causes of actions and allegations, including the right to file any FED. R. CIV. P. 12 motions to dismiss, the parties jointly request this extension of time. Based upon the foregoing, it is respectfully requested that the Court enter an order, under FED. R. CIV. P. 6(b)(1), expanding the time for the filing of Defendants' responsive pleading until **March 6, 2008**.

DATED: January 30, 2008

s/ Robert G. Nadalin

ROBERT G. NADALIN
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Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures of the United States District Court for the Southern District of California, I certify that the content of this document is acceptable to counsel for the Plaintiff and that I have obtained authorization from Robert G. Nadalin to affix his electronic signature to this document.

DATED: January 30, 2008

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s/ Caroline J. Clark

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